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[Our File#132060-HP]

Attorney for Plaintiff/Creditor,
SOLID CONSTRUCTION COMPANY, INC.

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

IN RE

THE SOURCE HOTEL, LLC

Debtor.

Case No: 8:21-bk-10525-ES

Chapter 11

**CREDITOR SOLID CONSTRUCTION
COMPANY, INC.'S JOINDER IN
OBJECTION OF CREDITOR ARAGON
CONSTRUCTION, INC.'S TO DEBTOR'S
MOTION FOR ENTRY OF ORDER: (1)
AUTHORIZING SALE OF
SUBSTANTIALLY ALL OF THE
DEBTOR'S ASSETS; (2) AUTHORIZING
THE DEBTOR'S ASSUMPTION AND
ASSIGNMENT OF GROUND LEASE AND
DETERMINING CURE AMOUNT; (3)
WAIVING THE 14-DAY STAY PERIODS
SET FORTH IN THE BANKRUPTCY
RULES 6004(H) AND 6006(D); AND (4)
GRANTING RELATED RELIEF**

DATE: September 30, 2021
TIME: 2:00 PM
PLACE: ZoomGov

Solid Construction Company, Inc. ("SCC") is a creditor who provided labor and materials for the improvement of the subject hotel owned by Debtor. On or about July 31, 2020, SCC duly recorded a verified Mechanic's Lien Claim, as Instrument No. 2020000374403 in the official records of Orange County, California, in accordance with the provisions of Civil Code §8416. The

1 amount of lien is \$700,000. Within 90 days therefrom, SCC instituted a legal action against the
2 Debtor to foreclose said Mechanic's Lien in the Orange County Superior Court Case No.30-2020-
3 01166792-CU-OR-CJC.

4 SCC hereby joins with Aragon Construction, Inc (and other mechanic lien claimants) in its
5 objection to Debtor's Motion For Entry Of Order: (1) Authorizing Sale Of Substantially All Of The
6 Debtor's Assets; (2) Authorizing The Debtor's Assumption And Assignment Of Ground Lease And
7 Determining Cure Amount; (3) Waiving The 14-Day Stay Periods Set Forth In The Bankruptcy
8 Rules 6004(H) And 6006(D); And (4) Granting Related Relief Filed September 16, 2021.

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10 Dated: September 29, 2021

LAW OFFICE OF HO-EL PARK, P.C.

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13 By: Ho-El Park, Esq.
14 Attorney for Plaintiff/Creditor,
15 SOLID CONSTRUCTION COMPANY, INC.
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
333 City Blvd. West, Suite 1700, Orange, CA 92868

A true and correct copy of the foregoing document entitled (*specify*): Creditor, Solid Construction Company, Inc.'s Joinder in Objection of Creditor Aragon Construction, Inc.'s to Debtor's Motion for Entry of Order: (1) Authorizing Sale of Substantially All of the Debtor's Assets; (2) Authorizing The Debtor's Assumption and Assignment of Ground Lease and Determining Cure Amount; (3) Waiving the 14-Day Stay Periods; and (4) Granting Related Relief will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 09/29/2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 09/29/2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

09/29/2021 Ho El Park
Date Printed Name

/s/ Ho-El Park
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Served VIA NEF

- Ron Bender: rb@lnbyb.com
- Sean R. Bozarth: seanb@novianlaw.com
- Christopher G. Cardinale: ccardinale@agclawfirm.com, mgonzalez@agclawfirm.com
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